

**Andrew Guzzo**

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**From:** Andrew Guzzo  
**Sent:** Monday, January 27, 2014 10:18 AM  
**To:** Lynch, John C.; Jones, Maryia Y.  
**Cc:** Leonard Bennett; Matt Erazquin; Dale Pittman; Kristi Cahoon Kelly  
**Subject:** RE: Kelly/Fariasantos- follow up  
**Attachments:** 1.27.14 Motion for Leave to File an Amended Complaint.doc; 1 27 14 Memo in Support of Motion for Leave to File an Amended Complaint.doc; 1.27.14 Proposed Amended Complaint.docx; 1.27.14 Proposed Order.doc

John and Maryia,

Attached is the motion, memorandum, proposed amended complaint, and order for Kelly. We would like to get this filed today. Would you please let us know whether you will consent to this filing?

Thank you,  
Andrew

**From:** Kristi Cahoon Kelly  
**Sent:** Saturday, January 25, 2014 3:03 PM  
**To:** Lynch, John C.; Jones, Maryia Y.  
**Cc:** Leonard Bennett; Matt Erazquin; Dale Pittman; Andrew Guzzo  
**Subject:** Kelly/Fariasantos- follow up

John and Maryia,

I just wanted to follow up on our conversation about the whether you consent to amending the complaint in Kelly. I thought you said you would get back to us last Wednesday, so I wanted to follow up. We will circulate the motion, memo, order and proposed complaint on Monday.

Also, I didn't hear from you about alternate dates for the corporate designee depos. I assume that unless we do, that those dates work for you. We plan to schedule court reporter and videographer on Monday, so please advise.

Thanks,

Kristi C. Kelly  
Kelly & Crandall, PLC  
4084 University Drive, Suite 202A  
Fairfax, VA 22030  
Direct: 703-424-7572  
Fax: 703-591-0167  
Email: [kkelly@kellyandcrandall.com](mailto:kkelly@kellyandcrandall.com)

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